

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

REBECCA BROWN and AUGUST  
TERRENCE ROLIN, on behalf of  
themselves and all others similarly situated,

*Plaintiffs,*

v.

TRANSPORTATION SECURITY  
ADMINISTRATION;

DAVID P. PEKOSKE, Administrator,  
Transportation Security Administration,  
in his official capacity;

DRUG ENFORCEMENT  
ADMINISTRATION;

UTTAM DHILLON, Acting Administrator,  
Drug Enforcement Administration, in his  
official capacity;

“STEVE” LAST NAME UNKNOWN,  
Agent, Drug Enforcement Administration, in  
his individual capacity; and

UNITED STATES OF AMERICA,

*Defendants.*

Civil Action No. 2:20-cv-00064-LPL

**MOTION FOR ADMISSION *PRO HAC VICE* OF JABA TSITSUASHVILI**

Jaba Tsitsuashvili, undersigned counsel for Plaintiffs Rebecca Brown, August Terrence Rolin, and all others similarly situated, hereby moves that he be admitted to appear and practice in this Court in the above-captioned matter as counsel *pro hac vice* for Plaintiffs, pursuant to LCvR 83.2 and LCvR 83.3, LCrR 83.2, and this Court’s Standing Order Regarding *Pro Hac Vice* Admissions dated May 31, 2006 (Misc. No. 06-151).

In support of this motion, undersigned counsel attaches the Affidavit for Admission *Pro Hac Vice* of Jaba Tsitsuashvili filed herewith, which, it is averred, satisfies the requirements of the foregoing Local Rules and Standing Order.

Dated: January 16, 2020.

Respectfully submitted,

/s/ Jaba Tsitsuashvili  
Jaba Tsitsuashvili  
DC Bar No. 1601246  
INSTITUTE FOR JUSTICE  
901 North Glebe Rd., Suite 900  
Arlington, VA 22203  
(703) 682-9320  
(703) 682-9321 (fax)  
jtsitsuashvili@ij.org

*Counsel for Plaintiffs*

**CERTIFICATE OF SERVICE**

I hereby certify that on this 16th day of January, 2020, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system.

I further certify that I caused a true and correct copy of the foregoing and accompanying documents to be sent by U.S. First Class Mail to the following addresses:

Transportation Security Administration  
Office of Chief Counsel, TSA-2  
601 S. 12th St.  
Arlington, VA 20598-6002

Drug Enforcement Administration  
Office of Chief Counsel  
8701 Morrissette Drive  
Springfield, VA 22152

Drug Enforcement Administration  
Pittsburgh District Office  
1781 McKees Rocks Rd.  
McKees Rocks, PA 15136

Attorney General William Barr  
U.S. Department of Justice  
950 Pennsylvania Ave. NW  
Washington, DC 20530

Scott W. Brady, U.S. Attorney for the  
Western District of Pennsylvania  
Civil Process Clerk  
Joseph F. Weis, Jr. U.S. Courthouse  
700 Grant Street, Suite 4000  
Pittsburgh, PA 15219

/s/ Jaba Tsitsuashvili